

**Nos. 25-1018(L), 25-1019, 25-1024**

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**IN THE UNITED STATES COURT OF APPEALS FOR THE  
FOURTH CIRCUIT**

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JEFFERSON GRIFFIN,  
*Petitioner-Appellee,*

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,  
*Respondent-Appellant,*  
and

ALLISON RIGGS, et al.,  
*Intervenor-Appellants.*

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On Appeal from the United States District Court  
for the Eastern District of North Carolina  
No. 5:24-CV-00724-M-RN  
Hon. Richard E. Myers, II

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**REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE BRIEF  
OF *AMICI* SCHOLARS OF DEMOCRATIC BACKSLIDING**

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## REPLY

Appellee opposes *amici* scholars' motion for leave to file (Dkt. No. 85) but identifies no valid basis for his opposition. *See* Dkt. No. 102. He does not dispute that *amici* sought the consent of all parties on January 16, 2025 (and both sets of Appellants consented). He does not dispute that *amici* timely filed their brief pursuant to Rule 29(a)(6). And he does not dispute that the scholars' brief is "desirable" or that it "assert[s]" "matters" that "are relevant to the disposition of the case." Fed. R. App. P. 29(a)(3).

Indeed, the scholars' brief is highly relevant to the disposition of this case. Their motion should be granted.

WHEREFORE, proposed *amici curiae* Scholars of Democratic Backsliding respectfully request that this Court grant their motion for leave to file the amicus brief that was filed along with to their initial motion (Dkt. No. 86).

Dated: January 24, 2025

Respectfully submitted,

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## CERTIFICATE OF COMPLIANCE

I hereby certify that:

1. This reply complies with the type-volume limitation of Fed. R. App. P. 27(d)(2) because, excluding the parts of the document exempted by the Rules, it contains 144 words.
2. This reply complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionally spaced typeface with 14-point Century Schoolbook font.

Date: January 24, 2025

/s/ Ari Savitzky

Ari Savitzky

*Counsel for Amici Curiae*

## CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

Date: January 24, 2025

/s/ Ari Savitzky  
Ari Savitzky

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